

Hon. David G. Estudillo

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

KEIKO HARADA,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC., an Ohio Corporation, and EQUIFAX
INFORMATION SERVICES, LLC, a Georgia
Limited Liability Company,

Defendants.

Case No. 3:23-cv-06061-DGE

STIPULATED MOTION FOR SECOND
EXTENSION OF TIME TO FILE
RESPONSIVE PLEADING TO
COMPLAINT, AND ORDER

Note on Motion Calendar: December 18, 2023

Defendant Equifax Information Services LLC (“Equifax”), by their attorneys and pursuant to Local Rules 7 and 10 of the Western District of Washington, moves for a second extension of time in which to answer or otherwise respond to the Complaint in this matter. It is stipulated and agreed to by and among counsel, that Defendant Equifax Information Services LLC’s time to answer, move or otherwise respond to the Complaint in this action is extended from December 27, 2023 through and including January 26, 2024. In support of its Motion, defendant states:

1 1. On November 1, 2023, plaintiff Keiko Harada served an unfiled Complaint from
2 Pierce County Superior Court, on defendant Equifax.

3 2. Equifax removed this matter to the U.S. District Court of the Western District of
4 Washington on November 20, 2023.

5 3. Plaintiff and defendant Equifax filed a stipulated motion for a first extension,
6 making Equifax's responsive pleading currently due December 27, 2023.

7 4. On December 18, 2023, counsel for Equifax conferred with plaintiff's counsel to
8 confirm that plaintiff had no objection to a second extension, extending Equifax's deadline to
9 answer or respond to plaintiff's Complaint by 30 days. Plaintiff's counsel confirmed that
10 plaintiff consents to Equifax's requested extension.

11 5. Thus, to allow Equifax additional time to investigate plaintiff's allegations and to
12 engage in informal settlement discussions with plaintiff's counsel, Equifax respectfully requests
13 this second and final extension of time to answer or otherwise respond to plaintiff's Complaint
14 through and including January 26, 2024.

15 6. This motion is filed before Equifax's response to plaintiff's Complaint is due.
16 Equifax's request is not sought for the purpose of delay, nor will the additional time adversely
17 affect the just, speedy, and inexpensive determination of this action. See Fed. R. Civ. P. 1.

18 7. This motion is filed in good faith and is supported by good cause.

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1 WHEREFORE, Equifax respectfully requests the Court to issue an Order extending the
2 time for Equifax to answer or otherwise respond to plaintiff's Complaint through and including
3 January 26, 2024.

4 DATED: December 18, 2023. MARKOWITZ HERBOLD PC

5
6 s/ Jeffrey M. Edelson

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ORDER

Based upon the foregoing Stipulated Motion for Second Extension of Time to Answer or Otherwise Plead, the Court hereby ORDERS AND ADJUDGES as follows:

1. The Stipulated Motion is GRANTED and ACCEPTED by the Court.
2. Defendant Equifax Information Services, LLC shall answer or otherwise respond to the Complaint by January 26, 2024.

DATED : January 3, 2024.



David G. Estudillo
United States District Judge

Presented by:

s/Jeffrey M. Edelson

Jeffrey M. Edelson, WSBA #37361
JeffEdelson@MarkowitzHerbold.com

Attorney for Defendant Equifax Information
Services, LLC

ATTORNEY CERTIFICATE OF SERVICE

I hereby certify that on December 18, 2023, I have made service of the foregoing
STIPULATED MOTION FOR SECOND EXTENSION OF TIME and ORDER on the parties
listed below in the manner indicated:

Robert Mitchell	<input type="checkbox"/>	U.S. Mail
Robert Mitchell, Attorney at Law, PLLC	<input type="checkbox"/>	Facsimile
1020 N Washington Street	<input type="checkbox"/>	Hand Delivery
Spokane, WA 99201	<input type="checkbox"/>	Overnight Courier
<i>Attorneys for Plaintiff</i>	<input checked="" type="checkbox"/>	Electronically via USDC CM/ECF system
	<input type="checkbox"/>	Email: bobmitchellaw@gmail.com
 Rachel D. Groshong	<input type="checkbox"/>	U.S. Mail
Stoel Rives LLP	<input type="checkbox"/>	Facsimile
600 University St, Suite 3600	<input type="checkbox"/>	Hand Delivery
Seattle, WA 98101	<input type="checkbox"/>	Overnight Courier
<i>Attorneys for Defendant Experian</i>	<input checked="" type="checkbox"/>	Electronically via USDC CM/ECF system
	<input type="checkbox"/>	Email: rachel.groshong@stoel.com
 Angela M. Taylor	<input type="checkbox"/>	U.S. Mail
JONES DAY	<input type="checkbox"/>	Facsimile
3161 Michelson Drive, Suite 800	<input type="checkbox"/>	Hand Delivery
Irvine, CA 92612	<input type="checkbox"/>	Overnight Courier
<i>Pro Hac Vice admission for Defendant Experian</i>	<input checked="" type="checkbox"/>	Electronically via USDC CM/ECF system
	<input type="checkbox"/>	Email: Angelataylor@jonesday.com

DATED: December 18, 2023.

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